

APPENDIX F

DISCOVERY PLAN WORKSHEET

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations:

11/4/19

Completion date for Phase I Discovery
as agreed upon by the parties:

*(Reciprocal and agreed upon document production,
generally not including depositions, unless otherwise agreed.
No more than 30 days after Initial Conference)*

11/14/19

Status conference TBD by the court:
(Generally 15 days post Tier I Discovery)

11/1/19

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post status conference)

11/18/19

First requests for production of documents
and for interrogatories due by:
(Presumptively 15 days post joining/amending)

12/3/19

All fact discovery completed by:
*(Presumptively 3.5 months post first
requests for documents/interrogatories)*

3/1/20

Exchange of expert reports completed by:
(Presumptively 30 days post fact discovery)

4/1/20

Expert depositions completed by:
(Presumptively 30 days post expert reports)

5/1/20

Final date to take first step in dispositive motion practice:
*(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)*

5/1/20

COMPLETION OF ALL DISCOVERY BY:
(Note: Presumptively 9 months after Initial Conference.)

6/18/20

Submission of joint pre-trial order:

8/1/20

Final Pre-Trial Conference TBD by the court:

8/10/20